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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In Re Terrorist Attacks on September 11, 2001

: 03 MDL 1570 (RCC)
: ECF Case

-----X
NEW YORK MARINE AND GENERAL
INSURANCE CO.,

Plaintiff,

v.

AL QAIDA, et al.,

Defendants.
-----X

: Case No. 04-CV-6105 (RCC)
: ECF Case
:
:
:

CONSENT MOTION AND STIPULATION AS TO FURTHER EXTENSION OF TIME

WHEREAS, on May 9, 2005, DMI Administrative Services S.A. ("DMI S.A.") served its Motion to Dismiss the above captioned action;

WHEREAS, on June 1, 2005 (Docket # 966), the Court signed the Stipulation and Order by and between DMI S.A. and plaintiffs providing that plaintiffs' time to oppose DMI S.A.'s Motion to Dismiss is extended until June 8, 2005;

WHEREAS, DMI S.A. and plaintiffs desire to extend the time for plaintiffs to oppose DMI S.A.'s Motion to Dismiss to and through June 29, 2005; and

WHEREAS, the parties having conferred hereby move the Court to adopt this Stipulation as to Further Extension of Time to Respond.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between counsel to the respective parties, that the time for plaintiffs to oppose DMI S.A.'s Motion to Dismiss shall be extended to and through June 29, 2005; and that DMI S.A. shall file reply papers within fifteen days of receipt of plaintiffs' opposing papers, if any.

Sent By: BROWN GAVALAS FROMM LLP;
06/08/2005 11:20 FAX 212 332 3888

2129835946;

Jun-8-05 11:31AM;

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IT IS FURTHER HEREBY STIPULATED AND AGREED that the parties hereto
reserve all rights and defenses not specifically addressed hereby.

Dated: New York, New York
June 8, 2005

Respectfully submitted,

BROWN, GAVALAS & FROMM, L.L.P.

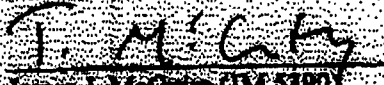
By:


David H. Fromm (DF 9334)
Frank J. Rubino, Jr. (FR 6202)
155 Lexington Avenue, 9th Floor
New York, NY 10017

Attorneys for Plaintiff

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By:


James J. McGuire (JM 5390)
Timothy J. McCarthy (TM 2118)
30 Rockefeller Plaza, 24th Floor
New York, N.Y. 10112

Attorneys for Defendant

D&M Administrative Services S.A.

SO ORDERED:

June 9, 2005


U.S.D.J.